

**Carl Moyer Memorial Air Quality Standards  
Attainment Program**

**Lower-Emission School Bus Program**

**AUDIT REPORT**

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**Mojave Desert and  
Antelope Valley Air Quality Management Districts  
Fiscal Years 2004/2005 – 2007/2008**

**Prepared by:  
Mobile Source Control Division  
Air Resources Board**

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## **Executive Summary**

This report covers the 2008 audit of the Mojave Desert and Antelope Valley Air Quality Management Districts (Mojave Desert and Antelope Valley AQMD or Districts) implementation of the Carl Moyer Memorial Air Quality Standards Attainment Program (Carl Moyer Program) and the Lower-Emission School Bus Program (School Bus Program). The California Air Resources Board (ARB) found that these programs as implemented by the Districts are achieving the expected emission reductions and are generally in compliance with State requirements. Audit findings, which are discussed below, mostly reflect omissions of required elements in Districts' forms and contracts. One finding regarding an ineligible school bus funded by the Antelope Valley AQMD has been partially mitigated by the District. There are two findings associated with the fiscal review. First, the interest associated with old school bus funds was not returned. Second, funds earmarked for the administration of the Carl Moyer Program have not been spent.

The Carl Moyer Program achieves reductions in air pollution by providing grants that fund the extra cost of voluntary purchases of heavy-duty diesel vehicles, engines, and equipment that meet cost-effectiveness criteria and achieve emission reductions that are surplus to regulatory requirements. The Carl Moyer Program is implemented at the local level by California's 35 local air pollution control/air quality management districts under the oversight of the ARB.

The School Bus Program is a voluntary State grant program to clean up the aging school bus fleet that serves California's public schools. The School Bus Program provides grants to purchase new school buses that replace older, high-polluting buses and to retrofit existing diesel buses with ARB-verified diesel emission control systems. Some air districts, including the Antelope Valley AQMD, do not participate in the State School Bus Program but use local motor vehicle fees (i.e., the \$2.00 fee authorized by Assembly Bill 923, statutes of 2004) to assist school districts in purchasing new school buses to replace older buses. Under State law, such projects funded by motor vehicle fees must still follow the ARB's Lower Emission School Bus Guidelines. Mojave Desert AQMD does not collect such motor vehicle fees and has not funded school bus replacement projects.

The Mojave Desert AQMD has jurisdiction over the air quality in the eastern Mojave Desert Air Basin, comprising San Bernardino and eastern Riverside counties. The Antelope Valley AQMD has jurisdiction over the air quality in the northeastern portion of Los Angeles County. While the Antelope Valley AQMD is unclassified for federal health-based ambient air quality standards for particulate matter (soot), it is classified as nonattainment for the ozone standard (smog). The Mojave AQMD is classified as nonattainment for ozone in the western Mojave Desert portion and the remaining area is not classified. Both districts do not meet California's more stringent ambient air quality

standards for ozone (smog) or particulate matter (soot). The projects funded under the Carl Moyer Program play a significant role in achieving emission reductions for the region to help attain and maintain federal and State ambient air quality standards. In addition, the emission reductions achieved by school bus replacements reduce children's exposure to harmful air pollutants during their developing years.

The ARB has awarded the Mojave Desert AQMD and Antelope Valley AQMD, more than \$5.4 and \$3.4 million, respectively, in State funds for the Carl Moyer Program over the first decade of the program (fiscal years 1998/1999 to 2007/2008). The Districts have leveraged State funds with over \$1.4 million for Mojave Desert AQMD and \$1.1 million for Antelope Valley AQMD in local match funds during those same years, utilizing funds that are under local control such as those generated by motor vehicle fees. The Districts together have funded over 130 cleaner engines, and have reduced NO<sub>x</sub> emissions by approximately 400 tons per year and diesel particulate matter emissions by approximately 25 tons per year.

This audit focused on the Mojave Desert and Antelope Valley AQMD's Carl Moyer Program as conducted during the 2005/2006 and 2006/2007 fiscal years. The audit also focused on Antelope Valley AQMD's School Bus Program during 2005/2006 and 2006/2007 fiscal years. The ARB conducted both program and fiscal review of the Districts' Carl Moyer and School Bus Programs. The audit was conducted for both districts simultaneously, since the programs being audited have large areas of overlap regarding staffing and administration.

The ARB audit of the Districts' Carl Moyer and School Bus Programs found that they run solid programs that generally meet the requirements of the Health and Safety Code and applicable Guidelines. In addition, the audit has identified the electronic file management system as a commendable effort. A commendable effort is an element in a district's program where the district goes above and beyond the basic Carl Moyer Program requirements.

Finally, the audit resulted in five findings regarding the Mojave Desert and Antelope Valley AQMD's implementation of the Carl Moyer and School Bus Programs: omission of required information in forms and contracts, contracts missing program-critical Carl Moyer Program language, an ineligible school bus funded, unreturned interest from old School Bus Program retrofit projects, and unspent administration funds.

## **I. Audit Procedure Overview**

State law provides the Air Resources Board (ARB) with oversight responsibilities and the authority to audit district Carl Moyer and School Bus Programs (Health and Safety Code sections 39002, 39003, 39500, 39600, 39602, 39605(b), 41500, 44287, and 44291). School bus projects funded with locally-generated motor vehicle fees are also subject to ARB audit and must be consistent with ARB's Lower-Emission School Bus Program Guidelines (Health and Safety Code section 44229).

The audit of both programs followed a number of similar general procedures. The audit was conducted in two main phases; a desk review and an on-site review. ARB staff used risk-based audit selection criteria to identify a sample of Carl Moyer and School Bus Program projects for file (desk) reviews, and on-site field inspections were conducted on a subset of the Carl Moyer Program projects. ARB staff reviewed other Districts' documents such as forms, contracts, relevant Districts' Governing Board materials, and its policies and procedures manual. ARB staff also conducted a fiscal review of the Carl Moyer Program. Staff remained in close communication with the Districts throughout this process to clarify issues as they arose and to request additional materials as needed. See Attachments 1 and 2 for lists of the projects that were reviewed, and Attachment 3 for links to more detailed information regarding ARB audit procedures and other information resources.

## **II. Carl Moyer Program and School Bus Program Audit**

### **A. Mojave Desert and Antelope Valley AQMD's Implementation of the Carl Moyer Program**

The Mojave Desert and Antelope AQMD have participated in the Carl Moyer Program every year since the program's inception, with the exception that Mojave Desert did not participate in fiscal year 2001/2002. Mojave Desert and Antelope Valley AQMD share the same resources for program and fiscal staff, but have different governing boards. The process described herein refers to both districts unless noted otherwise. Likewise, references to "the Districts" throughout this document refer to both districts unless noted otherwise. The Districts use a first-come, first-served approach to solicit projects for funding, unless the Districts receive more requests for funding than covered by the funds available (i.e., is oversubscribed). This has happened during fiscal years 2005/2006 and 2006/2007 in Mojave Desert AQMD. In cases where the program is oversubscribed, the Mojave Desert AQMD competitively selects projects based on cost-effectiveness, emission reduction levels, and any other criteria approved by the Board. If funds are still available during the course of the year, the Districts will release a Call for Projects to solicit applications.

Applications are accepted on a continuous basis. Information regarding the Carl Moyer Programs is available on the Mojave Desert AQMD's website:

<http://mdaqmd.ca.gov/grants/documents/yr10app.pdf>, and Antelope Valley AQMD's website: <http://www.avaqmd.ca.gov/grants/documents/cmp10app-08.pdf>. Generally,

the Carl Moyer Program has not been oversubscribed and the Districts are able to fund most eligible projects. In fiscal year 2005/2006, the Antelope Valley AQMD provided \$100,073 of its funding to the Rural Assistance Pool.

Potential applicants typically learn about Carl Moyer Program funding opportunities through Districts' brochures, press releases, the Districts' website, and local community events (e.g., the District have a booth at the poppy festival and fair, and attend farm bureau meetings). The Districts also work with vendors and dealers to get information out to potential applicants.

Once an application is received, the Districts' staff assists the applicant in completing the required information. If the Districts have made attempts and the applicant is not responsive, then the Districts will send a letter identifying necessary information and will indicate that if the information is not received by a specific date, the project will be canceled. Districts' staff presents the proposed project for funding to their governing board for approval. The Districts' staff tries to conduct pre-inspections before Board approval but this is not always possible. If a project cannot be pre-inspected prior to the Board meeting, it may be approved provisionally. Once the Board approves the project, the Districts notify the applicant and send the applicant a contract for signature. The approval process can take up to 90 days. Mojave Desert AQMD's projects may take longer to receive approval than Antelope Valley AQMD's because the Mojave Desert AQMD's Board reviews projects in batches. Once the contract is signed, the grantee typically has three to six months to conduct the contracted work.

Once a grantee incurs project expenses and submits an invoice to the Districts for payment, the Districts' staff conducts a post-inspection of the project. Program staff also reviews the invoice to make sure it is consistent with information in the contract. Once approved by staff, the invoice package is submitted to the fiscal staff for payment. Grantees are required to report to the Districts regarding the status and operation of the project every year for the contract life.

To meet the Carl Moyer Program match requirement, the Districts typically utilize fifteen percent of administration in-kind contributions, Carl Moyer Program-type projects, and infrastructure projects (Mojave Desert AQMD only). As part of its annual grant application to the ARB for Carl Moyer Program funding, the Districts typically provide a list of specific projects for which match funding has already been obligated to substantiate that it is able to meet its match commitment. In fiscal year 2004/2005, the Mojave Desert AQMD requested the minimum funding allocation and the match requirement was waived.

## **B. Antelope Valley AQMD's Lower-Emission School Bus Program**

The Districts have not historically used State funds for their Lower-Emission School Bus Program. Instead, Antelope Valley AQMD uses locally-generated motor vehicle fees authorized under Assembly Bill 923 to fund replacement of older, pre-1977 buses. Mojave Desert AQMD does not collect AB923 fees and therefore does not fund new bus

purchases. The Antelope Valley AQMD works with school bus manufacturers and local school districts to solicit and complete applications when enough money becomes available to purchase a new school bus. The Antelope Valley AQMD maintains a list of eligible school buses that need to be replaced and uses it to help identify prospective projects when enough money becomes available to fund a school bus replacement project. For a district to use AB923 funds for the purchase of a new school bus, the bus purchase must be in accordance with ARB's Lower-Emission School Bus Program.

### **C. Commendable Effort**

A commendable effort is an exceptional practice that may serve as a model for other California districts' Carl Moyer Programs. This audit identified, as a commendable effort, the electronic file management system of the Mojave Desert and Antelope Valley AQMD.

The Mojave Desert and Antelope Valley AQMD utilize an electronic file management system to store their project files and manage the paperwork associated with the projects. The electronic files include administrative forms, Board action items, application information, background documentation, contract development information, reimbursement information, and grantee annual reports. Audit staff found that the electronic file folder format was consistent among projects, which facilitated document retrieval. This electronic management system also maximizes flexibility for the transfer of project documents between the two Districts, which is useful since the Mojave Desert AQMD office is located in Victorville and the Antelope Valley AQMD is located in Lancaster, approximately 60 miles apart. The electronic project files facilitate information-gathering and is portable for both ARB and Districts' use.

### **D. Recommendations for Future Carl Moyer Program Improvement**

The Mojave Desert and Antelope Valley AQMD should consider improving the current implementation of the Carl Moyer Program as noted below. These recommendations do not require a response from the Districts, although it may choose to comment in its written response to this audit report.

#### **1. Districts' Policies and Procedures Manual**

The Districts' Policies and Procedures Manual address the required elements outlined in the 2005 Carl Moyer Program Guidelines. However, if the guidelines required ARB approval, the depth and breath of the manual would be insufficient. ARB recommends that the Districts augment its Policies and Procedures Manual. The 2008 Carl Moyer Program Guidelines require ARB approval of the Districts' Policies and Procedures Manual before the Districts receive fiscal year 2008/2009 funds or when the Districts begin using the 2008 Guidelines, whichever comes first. The Policies and Procedures Manual will need to include sufficient details to enable a person outside of the Districts' program or a new employee to understand how the Districts' Carl Moyer Program functions. The Policies and Procedures Manual must also include district-specific



practices. On November 20, 2008, ARB staff provided the Mojave Desert AQMD an example of an ARB approved Policies and Procedure Manual that adheres to the 2008 Carl Moyer Guidelines to assist the Districts in updating their own Policies and Procedure Manual.

## **2. Destruction of Engines**

The Districts allow grantees to use various engine destruction methods to fulfill the engine destruction criterion. Through review of the Districts' post-inspection photos, it appeared that some engines had a very clean hole drilled into the engine block. The ARB audit team has concerns about these holes being patched and engines being placed back into operation. ARB audit staff recommends that the Districts consider using a scrap yard to meet engine destruction requirements. In addition to providing assurance of engine destruction, this recommendation may also ease the Districts' resources by allowing for Districts' staff to observe a sample of destroyed engines instead of observing destruction of every engine.

## **IV. Findings, Conditions, and Required Actions**

The following sections describe the audit findings and conditions, and set forth required actions that the Mojave Desert and Antelope Valley AQMD must undertake in implementing the Carl Moyer Program and the School Bus Program. "Findings" are brief descriptions of practices that are inconsistent with one or more of the following:

- State requirements under Health and Safety Code sections 44275 through 44299.2.
- Carl Moyer Program Guidelines (2003 and 2005 versions) (<http://www.arb.ca.gov/msprog/moyer/guidelines/current.htm>).
- School Bus Program Guidelines (2006 versions) (<http://www.arb.ca.gov/msprog/schoolbus/schoolbus.htm>).
- Program advisories.
- Grant Award and Authorization requirements.
- Mojave Desert and Antelope Valley AQMD's written policies and procedures, including its contracts with the engine owners/grant recipients.

"Conditions" are the more detailed descriptions of Districts' practices observed by ARB audit staff during the audit. "Required Actions" are the minimum actions the Mojave Desert and Antelope Valley AQMD must take to remedy the findings.

The Mojave Desert and Antelope Valley AQMD must provide ARB with a written response to the required actions by submitting a plan or method to remedy the respective findings listed below. The Districts' written responses must be submitted to ARB within 30 days from the date of the cover letter that accompanied this report. Finally, it is important to note that the District may have partially or fully mitigated the errors, omissions, or practices that caused the findings. These will be discussed in more detail below where applicable.

## **A. Carl Moyer Program and School Bus Program**

This section specifies findings, conditions and required actions resulting from the ARB's review of the Districts' Carl Moyer Program and Antelope Valley AQMD's Lower-Emission School Bus Program.

### **Finding 1: Omissions of Required Elements in Districts' Forms and Contracts**

**Condition:** ARB had a number of concerns regarding the Districts' forms and contracts. ARB found deficiencies in the Districts' inspection forms (pre- and post), grantee annual reporting forms, and language in boilerplate contracts.

- a. **Inspection Forms:** For projects subject to the 2005 Carl Moyer Program Guidelines, the Districts must have a dedicated form to document inspections. The Districts did not have such a dedicated form. The inspection information contained in project files was incomplete and difficult to follow. Some required elements that were missing include owner information (address and telephone number), location of the engine, engine information (model year), and verification of the operation of the engine.

**Required Action:** No further action is required to mitigate this audit finding, since the Districts have addressed these omissions by providing updated inspection forms which include requisite information. The Districts are required to use these updated forms in future inspections.

However, since the Districts require an hour meter or the equivalent on all projects a notation must be made on the inspection form to indicate that an hour meter was installed, or the project file must contain clear photographic documentation to show this. ARB staff recommends that inspectors document this in the comment area and the Districts include this as a practice in their Policies and Procedures. Further, the inspection form must note the owner's address and the method of destruction.

- b. **Grantee Annual Reporting Forms:** For projects subject to the 2005 Carl Moyer Program Guidelines, the Districts must require the owners of funded engines to submit an annual report. The format prescribed by the Districts did not contain all the required elements - specifically, owner information (address and telephone number), location of the engine, and engine information (horsepower).

**Required Action:** No further action is required. The Districts have addressed these omissions and provided an updated annual reporting

form which contains the required information. The Districts are required to provide the updated form to grantees for future annual reporting.

- c. **Carl Moyer Program Boilerplate Contract:** For projects subject to the 2005 Carl Moyer Program Guidelines, the Districts must include minimum contract requirements. The elements that were missing include the following:

1. The contract shall require that no work may begin on the project until the contract is fully executed (2005 Guidelines, Section B.1: Project Completion).
2. Payment terms must require itemized invoices from the engine supplier for repowers or paid invoices from the vehicle owner (2005 Guidelines, Section C.1. Payment-Itemized invoices)
3. All contracts shall include requirement that prohibits tampering. The owner is also responsible for maintaining a working hour meter, or other approved usage measuring device, for projects that document hours of operation as a means of calculating emission reductions and cost-effectiveness. If the hour meter/usage device fails, the owner remains responsible for validating any hours not recorded by the hour meter/usage device (2005 Guidelines, Section E. Maintenance of Engine/Vehicle).

**Required Action:** Carl Moyer Program funds for Fiscal Year 2008/2009 are in the process of being disbursed and associated projects must adhere to the 2008 Carl Moyer Program Guidelines requirements. Rather than requiring the Districts to update their boilerplate contracts for 2005 Carl Moyer Program Guidelines, the Districts are required to update their boilerplate contracts to criterion outlined in the 2008 Carl Moyer Program Guidelines and future executed contracts to incorporate the above listed elements. The Districts must provide ARB with updated boilerplate contracts by March 30, 2009.

- d. **Project-Specific Contract Omissions:**

The Morongo Basin Transit Authority contract did not specify the address of the infrastructure project being funded. In addition, the contract did not reference the application. The ARB audit team has concerns about the enforceability of the contract.

**Required Action:** The Mojave Desert AQMD is required to amend the project contract to include the infrastructure project location. The Mojave

Desert AQMD must provide ARB with a copy of this updated contract by March 30, 2009.

- e. **Lower Emission School Bus Contract:** AB 923 funds used for the purchase of new school buses must follow the ARB's Lower-Emission School Bus Program Guidelines. In accordance with those Guidelines, each contract must contain the following statement:

"The ARB shall assess a performance penalty of \$100.00 per day per bus on the business entity responsible for a delay that results in the failure to deliver to school districts any school bus purchased with funds from the Lower-Emission School Bus Program by the delivery deadline contained in this agreement. For each bus delivered to a school district after August 1, 2007, the local air district or the California Energy Commission, whichever public agency is responsible for administering the program, shall reduce the grant award payable to the school bus distributor or school district by an amount equal to the calculated performance penalties."

**Required Action:** The Antelope Valley AQMD is required to update their boilerplate contracts and ensure that future executed contracts to incorporate the above statement. The Antelope Valley AQMD must provide updated boilerplate contracts and copies of updated project-specific contracts by March 30, 2009.

**Finding 2: Contracts Missing Critical Carl Moyer Program Language that Prohibits Funded Projects from being used for Emission Reduction Credits**

**Condition:** The boilerplate contract and all contracts reviewed are missing a required contract element identified in the 2005 Guidelines. The element missing is as follows: "Rights to the emission reductions must not be claimed by any participant as emission reduction credits or in an averaging, banking, and trading program."

**Required Action:** The Districts must amend the contracts for fiscal years 2005/2006 and 2006/2007 projects - as well as the boiler plate contract - to include the above listed element. The Districts must include this language in all future contracts and must provide copies of the updated contracts to ARB by March 30, 2009.

### **Finding 3: Ineligible School Bus Funded**

Condition: The 2006 Lower-Emission School Bus Program Guidelines outlines the engine emission requirements for new school buses replacing in-use pre-1977 model year school buses. For 2006 model year diesel-fueled school buses, the replacement bus engine must be certified to emit no more than 0.01 g/bhp for particulate matter. However, a replacement school bus purchased has an engine particulate matter standard level of 0.10 g/bhp-hr and therefore is not eligible for funding.

Required Actions: The Antelope Valley AQMD has taken steps to mitigate this finding. Upon noting that this requirement was not met, the Antelope Valley AQMD worked with the bus manufacturer to install a retrofit device that lowers particulate matter emissions on the bus at the manufacturer's expense. ARB approved this mitigation strategy on a case by case basis. A bus retrofitted with a particulate matter control device does not achieve the same emission level and does not have the same durability requirements as a new bus that meets program guidelines. Therefore, ARB is requiring the Antelope Valley AQMD to monitor the bus and retrofit for the contract life of the project and report the status of this project to ARB at the time of the grantee's annual project report. If there are any problems with the funded bus not operating as intended, the Antelope Valley AQMD must replace the bus with a new bus meeting the current Lower-Emission School Bus Program Guidelines.

### **Finding 4: Unreturned Interest from Old Lower Emission School Bus Funds**

Condition: In August 2007, both Districts returned fiscal year 2000/2001 Lower-Emission School Bus retrofit project funds to the ARB. At that time, the Districts indicated they would also return the associated interest. As of October 2008, no additional funds were returned.

Required Actions: No further action is required to mitigate this audit finding. As of early December 2008, the Districts have returned the associated interest described above, \$55,160.75 was received from Los Angeles County for Antelope Valley's AQMD's portion and \$70,808.24 was received from Mojave Desert AQMD for the their portion.

### **Finding 5: Unspent Administration Funds**

Neither Mojave Desert AQMD nor Antelope Valley AQMD has expended the outreach and administration funds (Administration Funds) provided with fiscal years 2004/2005 and 2005/2006 Carl Moyer Program Grants. These funds must be spent within the same timeframe as the program

funds, which is by June 30 of the second year after the allocation, as follows:

District	Fiscal Year	Administration Funds	Expended by:
Antelope Valley AQMD	2004/2005	\$ 6,414	June 30, 2007
	2005/2006	\$12,114	June 30, 2008
Mojave Desert AQMD	2004/2005	\$ 4,630	June 30, 2007
	2005/2006	\$16,735	June 30, 2008

#### Required

##### Actions:

In accordance with 2005 Carl Moyer Guidelines, the outreach and administration grant funds can be used to implement the Carl Moyer Program. Examples of allowable expenses include staff resources assigned to the program administration printing, mailing, transportation and travel costs incurred by such staff to implement the Carl Moyer Program. The Districts must provide official accounting system documentation that demonstrates the outreach and administration funds were expended by the respective deadlines. If appropriate documentation cannot be provided, the Districts must return the administration funds by January 30, 2009.

In addition, the Districts have indicated that in-kind contributions of administrative funds are being used to fulfill a portion of the Carl Moyer Program match requirements. During the audit review, ARB found that the Districts have sufficient funds from projects to meet all match requirements. However, if the Districts wish to continue using in-kind contributions towards match for fiscal years 2004/2005 and 2005/2006, documentation must be provided showing in-kind match funds were spent in accordance with the 2005 Carl Moyer Guidelines.

# Attachment 1

## List of Projects Reviewed

2008 Carl Moyer Program Audit of the  
Mojave Desert and Antelope Valley  
Air Quality Management Districts

## 2008 Carl Moyer Program Audit Project Files Reviewed

Mojave Desert Air Quality Management District						
Project Name	Project Number	Fiscal Year of Funding and Source	Source Category	Eligibility Review	In-Depth File Review	Site Visit
Caufield	MD#0406	2004/2005 2005/2006 interest	off-road	X	X	X
Cooley Construction Inc.	MD#0407#7	2005/2006 2006/2007	off-road	X		
City of Victorville	MD#0808#7	2005/2006 2006/2007	on-road	X		
Mitsubishi #3	MD0808#08	Withdrawn	Locomotive			
Morongo Basin Transit Authority	MD#0405#X-5	2005/2006 - match 2006/2007 – match	infrastructure	X		

Antelope Valley Air Quality Management District						
Project Name	Project Number	Fiscal Year of Funding and Source	Source Category	Eligibility Review	In-Depth File Review	Site Visit
Moss Equipment Rental	AV0506#15	2004/2005 2005/2006 2005/2006 – match	off-road	X		
Grimmway Farms	AV0106#07	2005/2006	agricultural pump	X	X	X
Camarillo Engineering	AV0507#07	2005/2006 2006/2007	off-road	X		
Service Rock #2	AV1004#5	2004/2005 – match	off-road	X	X	X



## Attachment 2

### List of Projects Reviewed

2008 School Bus Program Audit of the  
Antelope Valley Air Quality Management District

**Antelope Valley Air Quality Management District  
2008 Lower-Emission School Bus Program Audit  
List of Projects Reviewed**

Public School District / Contractor Servicing Public School District	Project Number	Project Type
2005/2006 Fiscal Year		
Wilsona Unified School District	AV0606#11	2 new buses to replace pre-1977's
2006/2007 Fiscal Year		
Antelope Valley Schools Transportation	AV0307#10	3 new buses to replace pre-1977's

## Attachment 3

### Resources

# Resources

1. Air Resources Board Carl Moyer Program Website  
<http://www.arb.ca.gov/msprog/moyer/moyer.htm>
2. Air Resources Board Lower-Emission School Bus Program Website  
<http://www.arb.ca.gov/msprog/schoolbus/schoolbus.htm>
3. Air Resources Board Incentives Oversight Audit Website  
(Includes previous reports and Audit Policies and Procedures)  
<http://www.arb.ca.gov/msprog/moyer/audits/audits.htm>
4. Antelope Valley Air Quality Management District Website  
<http://www.avagmd.ca.gov/index.htm>
5. Mojave Desert Air Quality Management District Website  
<http://www.mdaqmd.ca.gov/>